

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection *DC4 21 002 1156*
Walter Reed Army Medical Center

DATE: *3/13/84*

FROM: Vickie Province, Environmental Engineer
RCRA Enforcement Section (3HW11) *VP*

TO: File

Thru: Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11) *[Signature]*

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

Clear out, eAction
HWMS
entire

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF ENVIRONMENTAL SERVICES

ADDRESS REPLY TO
OFFICE OF ENVIRONMENTAL
STANDARDS AND QUALITY ASSURANCE
5010 OVERLOOK AVENUE, S.W.
WASHINGTON, D. C. 20032-5397



MEMORANDUM TO: Angelo C. Tompros, Acting Chief *AT*
Bureau of Pesticides & Hazardous Waste
Management

FROM: *NS*
Neilima Senjalia, Consumer Safety Officer
Division of Hazardous Waste Management

DATE: February 6, 1984

SUBJECT: RCRA Compliance Evaluation Inspection at Walter Reed
Army Medical Center (WRAMC)

On January 27, 1984, Ms. Senjalia and Mr. Bacon met with Mr. Armand Thomas, Environmental Coordinator WRAMC to conduct a follow-up of the RCRA inspection conducted on September 29, 1983.

During the inspection on September 29, 1983, it was noticed that WRAMC had some containers in storage for over 90 days. This situation still exists. Mr. Thomas informed the inspectors that this facility is having problems with their contractor. They are trying to remedy the situation and if it is not resolved soon WRAMC will seek a new contractor. Also, most containers did not have the date accumulation began marked on them.

WRAMC now has a plan to deal with hazardous chemical emergencies but this plan does not address detailed emergency procedures that the personnel will implement in response to fire, explosions or unplanned releases of hazardous wastes.

The facility has written position descriptions for some positions related to hazardous waste but does not maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job. Nor does it maintain records of hazardous waste management training received.

Another follow-up inspection will be conducted next quarter to assure compliance.

Attachment

cc: D.Doner
A.Thomas

ENVIRONMENTAL SERVICES
B. A. [unclear] D

1984

RCRA CHECKLIST FOR INSPECTION OF GENERATORS

Name of Facility: Walter Reed Army Medical Center
 Address: 6825 16th Street
Washington, D.C. 20012
 EPA Generator ID Number: DC 421 002 1156
 Facility Inspection Representative: Mr. Armand Thomas
 Title: Environmental Coordinator
 Telephone Number: (202) 576-2466

RO USE

Inspection file

No. _____

Reviewer _____

Date reviewed: _____

Form "A"

Pert. Regs.
 40 C.F.R.
 Part:

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

Medical Installation, waste is generated in research related activities.

2. Does the generator dispose of its wastes....

- A. On-site
 B. Off-site (Circle one or both)

Note: if on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

3. What is the amount of hazardous waste (in kilograms) produced by the generator facility in a month? 2,000 lbs in a year? 24,000 lbs
 (If the amount is less than 1,000 kg/month, then the facility qualifies as a small generator and Form C should be completed instead of Form A.)

4. What categories of hazardous wastes result from the generator's facility? Please circle:

- A. Ignitable wastes
 B. Reactive wastes
 C. Corrosive wastes
 D. EP Toxic wastes

Yes No
Yes No
Yes No
 Yes No

- E. RCRA Listed Waste Yes

Solvents & Organic Chemicals.

262.12

5. Is the generator presently...

Circle one:

A. Treating hazardous waste?

Yes ☒ No

B. Storing hazardous waste? *This facility is having problems with the contractor, the waste has been in storage for over 90 days.*

Yes ? No

C. Disposing hazardous waste?

Yes ☒ No

Note: if the generator performs any of the activities noted in Question 5, then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."

262.20

6. Is a manifest system currently in operation at the generator's facility so that offsite shipment of hazardous wastes can be tracked?

☒ Yes No

7. Please inspect the generator's manifest for the following information:

A. Is the TSD facility which receives a generator's hazardous waste identified by name, address, and EPA ID number?

☒ Yes No

262.20(c)

B. Is an alternative facility designated in case of an emergency?

Yes ☒ No

C. Is a serialized manifest document number included on the form?

☒ Yes No

262.20(a)
(2)

D. Is the generator's name, address, telephone number and EPA ID number included on the form?

☒ Yes No

262.20(a)
(3)

E. Is the name and identification number of each transporter included on the form?

☒ Yes No

F. Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest?

☒ Yes No

G. Is the quantity of each waste by units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form?

☒ Yes No

H. Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature?

"This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the available regulations of the DOT and EPA."

☒ Yes No

262.22

I. Are there adequate copies of the manifest available for generator, transporter, and TSD's?

☒ Yes No

8. Is hazardous waste being stored on-site by the generator for less than 90 days? *See 5.B.*

Yes ? No

If so,

262.34(a)
(3)

A. Is the date accumulation of waste began clearly marked on each storage container?

Yes ☒ No

- 262.34(a)(2) B. Are storage containers in good condition, i.e., no corrosion, leaking, or structural deformations? Yes ☒ No
- 262.34(a)(4) C. At the time of accumulation, are the storage containers clearly labeled as containing a particular hazardous waste in accordance with ~~DOT~~ regulations? *Some other Containers are bulging* Yes ☒ No
9. Does the generator have an established contingency plan to deal with emergencies that may impact hazardous waste currently in storage at the facility? *But this plan is not adequate* Yes ☒ No
- 265.16(a) 10. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? *On the job training* Yes ☒ No
- 265.16(d) 11. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job? Yes ☒ No
- 265.16(d)(2) 12. Does the generator facility have on record a written position description for each job title noted in Question #11? *for some Positions.* Yes ? No
- 265.16(d)(3) 13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #11? Yes ☒ No
- 265.32(a) 14. *Does the generator facility have installed the following equipment:
- A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? Yes ☒ No
- B. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? Yes ☒ No
- C. Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals? Yes ☒ No
- 265.35 15. *Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? Yes ☒ No
- 265.50 16. Does the facility have a contingency plan which contains the following elements:
- 265.52(c) A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? yes ☒ No
- 265.52(d) B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? *with fire department.* Yes ☒ No

265.52(d)

C. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?

☒ Yes

☐ No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

265.52(e)

D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility?

☒ Yes

☐ No

265.52(f)

E. *An evacuation plan for the generator facility if Management believes such a plan is a definite requirement for their particular generator facility.

☐ Yes

☒ No

17. Please provide detailed comments on specific problems encountered during the inspection. For instance, industry requests for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Inspector's Name: Ms. Neilima Senjalia

Title: Consumer Safety Officer

Agency: Bureau of Pesticides & Hazardous Waste Mgmt.
DEPT. of Environmental Services

Office location: 5010 Overlook Ave SW, # 114
Wash. DC. 20032

Date of Inspection: January 27, 1984

Inspector's Name: Mr. Byron Bacon

Title: Sanitarian

Agency: Same as Above

Office location: "

Date of Inspection: "

FILE

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DEPARTMENT OF ENVIRONMENTAL SERVICES

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WASHINGTON, D. C. 20032-5397



February 27, 1984

CERTIFIED MAIL NO. 954216
RETURN RECEIPT REQUESTED

Col. Lewis Sowell, Director
Facilities Engineering
Walter Reed Army Medical Center
6825-16th Street, N.W.
Washington, D.C. 20012

15 1985

Notice of Warning
EPA ID #DC 421 002 1156

Dear Col. Lewis:

This Notice of Warning is issued pursuant to the District of Columbia Hazardous Waste Management Act, D.C. Law 2-64, D.C. Code, Section 6-711.

During the compliance evaluation inspection conducted at your facility on January 27, 1984, the following violations to the D.C. Hazardous Waste Management Act and the D.C. Hazardous Waste Management Regulations were noted:

- 1) Your facility is storing waste for over 90 days (See Section 262.34).
- 2) The date accumulation began is not marked on all storage containers (See Section 262.34(a)(2)).
- 3) All storage containers are not in good condition. Some ether containers were bulging (See Section 262.34(a)(2) and 265.171).
- 4) The contingency plan does not give emergency procedures to be implemented by facility personnel (See 265.52(a)).
- 5) Your facility does not have written position descriptions related to hazardous waste for all positions, and does not maintain a record of job titles for personnel that are involved with hazardous

Col. Lewis C. Sowell, Jr.

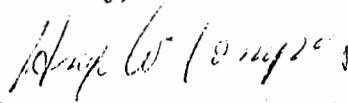
Page Two

waste management and the name of employee filling each job, nor does it maintain records of hazardous waste training received. (See Section 265.16(d)).

The above mentioned violations (1 - 5) must be corrected within 30 days of the receipt of this notice. Continued non-compliance may result in enforcement actions including civil penalty proceedings against your facility.

Should you have any questions regarding this notice, please contact me at (202) 767-8422.

Sincerely,



Angelo C. Tompros, Acting Chief
Bureau of Pesticides & Hazardous Waste
Management

cc: Mr. Armand Thomas